REMARKS

Claims 1-21 are pending in this application. By this Amendment, claims 3 and 18 are amended. No new matter is added.

I. Personal Interview

The courtesies extended to Applicants' representative by Examiner Peralta during the interview held August 10, 2005, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview. For example, as discussed and agreed during the interview, the claim amendments distinguish over the applied art.

II. Claim Rejections Under 35 U.S.C. §112

Claims 3 and 18 are rejected under 35 U.S.C. §112, second paragraph. Specific language is identified in claims 3 and 18 as forming the basis of the rejection. As claims 3 and 18 are amended in response to the rejection, withdrawal of the rejection under 35 U.S.C. §112, second paragraph is respectfully requested.

III. Claim Rejections Under 35 U.S.C. §103

Claims 1-21 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,845,012 to Ohkouchi in view of U.S. Patent No. 6,495,924 to Kodama et al. (Kodama). The rejection is respectfully traversed.

Neither Ohkouchi nor Kodama, whether considered alone or in combination, disclose or suggest each and every feature recited in the rejected claims. For example, the combination of references fails to disclose or suggest a semiconductor module, comprising a semiconductor chip having a first surface and a second surface; a first electrode plate contacting the first surface of the semiconductor chip; a second electrode plate contacting the second surface of the semiconductor chip; and a resin mold for sealing the first and second electrode plates and the semiconductor chip, wherein the resin mold includes an inner

pressure release portion that passes from an interior of the resin mold to an exterior of the resin mold for releasing an inner pressure in the resin mold, as recited in claim 1.

Additionally, as discussed and agreed during the interview, the combination of references fails to disclose or suggest a semiconductor module, comprising a semiconductor chip having a first surface and a second surface; a first electrode plate contacting the first surface of the semiconductor chip; a second electrode plate contacting the second surface of the semiconductor chip; and a resin mold for sealing the first and second electrode plates and the semiconductor chip, wherein each of the first and second electrode plates includes an inner pressure release portion that passes from an interior of the resin mold to an exterior of the resin mold for releasing an inner pressure in the resin mold, as recited in claim 12.

It is admitted in the Office Action that Ohkouchi fails to disclose a resin mold having an inner pressure release portion as recited in the rejected claims. To overcome the admitted deficiencies, Kodama is combined with Ohkouchi and it is alleged that it would have been obvious to one of ordinary skill in the art at the time the invention was made to make such a combination thereby rendering claims 1-21 obvious. However, Kodama fails to disclose the features as alleged in the Office Action. For example, it is alleged in the Office Action that Kodama discloses "a resin (6, 42) that includes an inner pressure release portion for releasing an inner pressure in the module."

Kodama relates to a press contact type semiconductor device capable of ensuring a uniform contact condition between semiconductor elements and package electrodes, and a decrease in thermal resistance and electrical resistance (col. 1, lines 8-13). The device of Kodama seeks to ensure the uniform contact condition between the semiconductor elements by providing a metallic netting 9 between electrode plates 7, 8, as shown in Figs. 2A-2C. The metallic netting deforms significantly with compression and the thickness of the metallic netting is decreased. Because a pressure load is concentrated to the portion where the

metallic netting is contacted with the electric plates, the pressure applied to this portion becomes extremely higher than the apparent pressure, and the metallic netting is readily deformed by compression. Since the amount of deformation of this portion is significant, oxide film on the surface of the metal is broken and a desirable contact with a newly generated plane can be obtained. In accordance with this effect, the electrical resistance is decreased (see col. 5, lines 34-65). By controlling the pressure on the area where the metallic netting is disposed, Kodama addresses the problem of ensuring uniform contact and decreasing thermal resistance in a semiconductor device having the press contacting structure of multiple chips in parallel.

Additionally, the components of the alleged "resin (6, 42)" are specifically described in the specification as an uneven metallic plate 6 (see Fig. 1) and "a punching metal" 42 made of copper (Fig. 11, col. 11, lines 13-15). Therefore, Kodama fails to disclose the feature as alleged in the Office Action. Accordingly, withdrawal of the rejection of claims 1-21 under 35 U.S.C. §103(a) is respectfully requested.

IV. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-21 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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